

**IN THE UNITED STATES DISTRICT COURT FOR THE  
WESTERN DISTRICT OF MISSOURI  
SOUTHWESTERN DIVISION**

**MOTION FOR CONTINUANCE**

COMES NOW Defendant, Colby Fronterhouse, by counsel Erica Mynarich, and moves this Court pursuant to 18 U.S.C. § 3161 (h)(7)(A) and (B) to remove this case from the scheduled docket and to continue this case until the September 2021 trial docket.

## **SUGGESTIONS IN SUPPORT**

- 1) Defendant was charged by Complaint and detained. He was then indicted on February 23, 2021.
- 2) Defense counsel and the Government have discussed a possible plea agreement but the final terms of the plea agreement have not yet been agreed upon. These plea negotiations are ongoing.
- 3) Therefore, counsel requests this continuance of the case to the September 2021 docket.
- 4) Counsel conferred with AUSA Stephanie Wan who indicated that the United States does not oppose this continuance.
- 5) This continuance is not sought for purpose of dilatory delay.

6) In accordance with 18 U.S.C. § 3161 (h)(7)(A) and (B) (iv), it is submitted that a continuance outweighs the best interests of the public and the defendant to a speedy trial, which is required by 18 U.S.C. § 3161(c)(1). Under the provisions of 18 U.S.C. § 3161 (h)(7)(A), the period of time until the requested criminal trial docket setting should be excluded in computing the period of time in which the defendant should be brought to trial under the provisions of the Speedy Trial Act.

WHEREFORE, Defendant, Colby Fronterhouse, respectfully requests this Court to continue this case until the September 2021 trial docket or to any other subsequent date which this Court deems appropriate.

Respectfully submitted,

*/s/ Erica Mynarich*  
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#### **CERTIFICATE OF SERVICE**

The undersigned hereby certifies that a copy of the forgoing was delivered July 9, 2021, to the CM-ECF system of the United States District Court of the Western District of Missouri for electronic delivery to all counsel of record.

*/s/ Erica Mynarich*